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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	)	Chapter 11
	)	
VOYAGER DIGITAL HOLDINGS, INC. <i>et al.</i> , <sup>1</sup>	)	Case No. 22-10943 (MEW)
	)	
Debtors.	)	(Jointly Administered)
_____	)	

**DECLARATION OF  
CHRISTINE A. OKIKE, P.C. IN SUPPORT OF  
DEBTORS' MOTION TO SHORTEN THE NOTICE  
PERIOD WITH RESPECT TO THE DEBTORS' MOTION  
FOR ENTRY OF AN ORDER (I) VESTING THE DEBTORS'  
REPRESENTATIVES WITH AUTHORITY TO COMPLY WITH APPLICABLE  
LAW IN CONSUMMATING THE PLAN AND (II) GRANTING RELATED RELIEF**

I, Christine A. Okike, P.C., hereby declares under penalty of perjury pursuant to section 1746 of title 28 of the United States Code:

1. I am an attorney admitted to practice before this Court and a partner at Kirkland & Ellis LLP, counsel for the above-captioned debtors and debtors in possession (collectively, the "Debtors"). I submit this declaration in support of the *Debtors' Motion to Shorten the Notice*

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors' principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

*Period with Respect to the Debtors' Motion for Entry of an Order (I) Vesting the Debtors' Representatives with Authority to Comply with Applicable Law in Consummating the Plan and (II) Granting Related Relief* (the "Motion to Shorten Notice") seeking an order to shorten the notice period on the *Debtors' Motion for Entry of an Order (I) Vesting the Debtors' Representatives with Authority to Comply with Applicable Law in Consummating the Plan and (II) Granting Related Relief* [Docket No. 1334] (the "Plan Clarification Motion")<sup>2</sup> filed contemporaneously herewith. Unless otherwise stated, I have personal knowledge of the facts set forth herein.

2. As set forth in the Plan Clarification Motion, the Debtors are seeking to clarify that the Debtors, the Wind-Down Debtor, the Plan Administrator, and their employees, management, officers, directors and members, as applicable (the "Debtors' Representatives"), in their capacity as such and, for the avoidance of doubt, in connection with effectuating the terms of the Plan, are authorized to take, or refrain from taking, any actions the Debtors' Representatives deem necessary in their business judgement to comply with applicable law. The clarification sought in the Plan Clarification Motion is to allow the Debtors to effectuate the Plan in the midst of an uncertain and evolving regulatory landscape.

3. The Plan Clarification Motion requires expedited consideration by the Court to allow the Debtors to effectuate the Plan and return value to creditors as soon as possible. In the event the notice period is not shortened and a hearing is not set in the immediate future, the Debtors risk further delay (and the costs associated therewith) to effectuating the Plan and making long-awaited distributions to customers and other creditors.

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<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Plan Clarification Motion.

4. Accordingly, the Debtors submit that cause exists to shorten the notice in light of the undue harm and burden that further delays of the effectuation of the Plan have on the Debtors and their stakeholders.

New York, New York  
Dated: April 21, 2023

/s/ Christine A. Okike  
Christine A. Okike, P.C.